

Department of Energy

Ohio Field Office Fernald Closure Project 175 Tri-County Parkway Springdale, Ohio 45246

JUL 2 0 2006



DOE-0168-06

Mr. James A. Saric, Remedial Project Manager United States Environmental Protection Agency Region V-SRF-5J 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Mr. Thomas Schneider, Project Manager Ohio Environmental Protection Agency Southwest District Office 401 East Fifth Street Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE OPERABLE UNIT 3 FACT SHEET - BENEFICIAL REUSE OF CLEAN BUILDINGS AND STRUCTURES AT THE UNITED STATES DEPARTMENT OF ENERGY - FERNALD CLOSURE PROJECT

References:

- 1) Letter DOE-0140-06, J. Reising to J. Saric and T. Schneider, "Transmittal of the Operable Unit 3 Fact Sheet Beneficial Reuse of Clean Buildings and Structures at the United States Department of Energy Fernald Closure Project," dated June 1, 2006
- 2) Letter, J. Saric to J. Reising, "OU3 Fact Sheet: Beneficial Reuse of Clean Buildings and Structures," dated June 16, 2006
- 3) Letter, T. Schneider to J. Reising, "OU3 Fact Sheet Beneficial Reuse of Buildings and Concrete," dated June 19, 2006

Enclosed for your approval are responses to Ohio Environmental Protection Agency comments on the Operable Unit 3 Fact Sheet describing the beneficial reuse of clean buildings and structures at the Fernald Closure Project. This Fact Sheet has also been reviewed and approved by the United States Environmental Protection Agency as noted in Reference 2. Upon concurrence, all comment responses will be incorporated in the revised final Fact Sheet.

Mr. Thomas Schneider

If you have any questions or require additional information, please contact me at (513) 648-3139.

Sincerely,

Johnny W. Reising

Director

Enclosure

cc w/ enclosure:

- J. Desormeau, DOE-OH/FCP
- J. Powell, DOE-LM
- J. Reising, DOE-OH/FCP
- G. Stegner, DOE-OH/FCP
- G. Jablonowski, USEPA-V, SRF-5J
- M. Cullerton, Tetra Tech
- M. Shupe, HSI GeoTrans
- S. Helmer, ODH
- B. Bilson, Fluor Fernald, Inc./MS1
- J. Chiou, Fluor Fernald, Inc./MS88
- J. Homer, Stoller/MS12
- F. Johnston, Fluor Fernald, Inc./MS12
- M. Miller, Stoller/MS2
- C. Murphy, Fluor Fernald, Inc./MS1
- AR Coordinator, Fluor Fernald, Inc./MS6

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE OPERABLE UNIT 3 FACT SHEET - BENEFICIAL REUSE OF CLEAN BUILDINGS AND STRUCTURES AT THE U.S. DOE - FERNALD CLOSURE PROJECT

FERNALD CLOSURE PROJECT FERNALD, OHIO

JULY 2006

U.S. DEPARTMENT OF ENERGY

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE OPERABLE UNIT 3 FACT SHEET - BENEFICIAL REUSE OF CLEAN BUILDINGS AND STRUCTURES AT THE U.S. DOE - FERNALD CLOSURE PROJECT

COMMENTS

1. Commenting Organization: Ohio EPA Commenter: OFFO

Section #: General Pg #: Line #: Code: C

Original Comment #: 1

Comment: For those areas where concrete or ballast is going to be beneficially reused as fill, provisions must be added to the LMIC for annual or more frequent inspection to ensure that erosion has not exposed the debris and that the material is functioning to provide the intended benefit.

Response: The June 2006 LMICP indicates that routine site inspections will be conducted quarterly (Volume II, Table 2-1, Controls and Disturbance and Use of the Fernald Site and Section 2.1.3.3). The corresponding appendix in Volume II, Appendix D, which details these inspections (i.e., Fernald Site Area Post-Closure Inspection Checklist), indicates that the site, including all restored areas, will be inspected for excess erosion (Line Item 1I). The areas in question will be evaluated during these routine inspections.

Action: No action required.

2. Commenting Organization: Ohio EPA Commenter: OFFO

Section #: General Pg #: Line #: Code: C

Original Comment #: 2

Comment: It is unclear from the current progression of activities how ballast/stone could be used in the former Solid Waste Landfill as fill. The above-FRL excavation of the SWL was never completed due to potentially jeopardizing the railroad tracks. Thus the railroad must be

completed due to potentially jeopardizing the railroad tracks. Thus the railroad must be removed prior to completion of the SWL excavation. This would seem to necessitate double handling of the ballast during removal of the track and prior to completion of the SWL excavation and certification. Additional discussion of the logistical issues associated with

this proposed beneficial reuse is warranted prior to finalizing the document.

Response: The ballast/stone that needs to be removed in order to complete SWL area excavation and certification can be placed in Pit 5. Additional ballast/stone can also be placed in Waste Pit 5

as pointed out in Comment #3.

Action: Will revise the text to allow portion of the ballast/stone to be placed in the bottom of Pit 5.

3. Commenting Organization: Ohio EPA Commenter: OFFO

Section #: General Pg #: Line #: Code: C

Original Comment #: 3

Comment: There may be more actual beneficial uses of the ballast/stone than burying it in the bottom of excavations as fill. An example would be the use of the ballast as a pH buffering agent in the footprint of the basins to reduce dissolved uranium in surface waters. Another possible use of these materials would be as trail base. It is not clear from our review of the document that such uses are available. DOE should consider revision of the document to allow additional

beneficial reuses of ballast/stone with the concurrence of Ohio EPA and U.S. EPA.

Response: Agree.

Action: Revised text under "Reuse Decision No. 3" by adding the following paragraph:

"As restoration progresses, other beneficial uses of clean ballast and stone may be realized. For instance, some stone may be used for other purposes such as a base for parking, access areas, etc. DOE will discuss these opportunities with EPA and Ohio EPA as they arise."